

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

FILED

UNITED STATES DISTRICT COURT

AUG 14 2023

for the

Northern District of OhioCLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELANDEastern Division

1:23 CV 01591

Case No.

(to be filled in by the Clerk's Office)

Siren Lewis

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

CT Corporation System
CrossCountry Mortgage, Penetration

And all attendees Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☐ Yes ☒ No

JUDGE OLIVER

MAG. JUDGE PARKER

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Siren Lewis
 Address 5233 Bellaire Blvd #101
Bellaire TX 77401
City State Zip Code
 County Harris
 Telephone Number _____
 E-Mail Address _____

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name CrossCountry Mortgage
 Job or Title (if known) 1 Corporate Dr. Ste 360
 Address Lake Zurich
Lake Zurich IL 60047-8945
City State Zip Code
 County Lake County
 Telephone Number 847-550-7300
 E-Mail Address (if known) custserve@yourmortgageonline.com
☐ Individual capacity ☐ Official capacity

Defendant No. 2

Name Ronald Leonhardt Jr.
 Job or Title (if known) CEO
 Address 6858 Miller
Breksville OH 44141
City State Zip Code
 County Cuyahoga
 Telephone Number _____
 E-Mail Address (if known) _____
☐ Individual capacity ☐ Official capacity

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Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

CT Corporation System
1200 South Pine IslandPlantation
CityFL
State33324
Zip Code

Broward

☐ Individual capacity ☐ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Dorenmuehle Mortgage Inc.

1 Corporate Dr. Ste 360

Lake Zurich
CityIL
State60047
Zip Code

Lake County

847-556-7300

☐ Individual capacity ☐ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☐ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

May 2021 it was brought to my attention this account has me listed as borrower and I'm in fact the beneficiary and gent in due course. I was also brought to my attention this account has been billed to I the agent & beneficiary and I have sent countless affidavits requesting the validity of debt 2. Billing Corrections

- B. What date and approximate time did the events giving rise to your claim(s) occur?

I sent notarized letters attention Ron J. Leonhardt Jr. CEO & CrossCountry Mortgage 6850 Miller Rd. Brookville, OH 4414 beginning 8-2021. I have sent copies of corrective action with either no response or a general letter stating it will be looked into.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

CrossCountry Mortgage, Ron J. Leonhardt Jr. Corporation
 Doventale violated general federal consumer rights and state rights.
 I will attach a list of those rights in addition to 3 witnesses of the violations listed below. The damages they caused was a flare in anxiety and stress financial hardship continuously changing the dollar amount, continuous recorded calls after writing and verbalizing I do not wish to have a robot call me. TSR violation, 12 CFR 1026.13 violation and several others I will attach
 TXHAF are witnesses to their negligence in handling this account; creating hardship in communication and keeping accurate logs of balance and alleged payments due.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Harassment, Stress, I recieved some counseling, and had
Forced to pay under coercion

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

- 1) I will attach the monetary amount I am seeking for the violations of my rights.
- 2) I would like the court to provide a summary judgement per my affidavit being Truth in Maximum.
- 3) I would like to subpoena the phone calls where I was harassed by CrossCountry Mortgage Employees & the robot as evidence.
- 4) I would like the account corrected as per in full.
- 5) I would like to subpoena all letters sent to the defendants and all attendees as evidence of my due diligence to correct this account.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7-28-2023

Signature of Plaintiff

Printed Name of Plaintiff

[Signature]
Lewis, Siren-O'Shea/Agent/Beneficiary

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address